

Statement of Thera Bradshaw

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Federal Communications Commission
Dale Hatfield Inquiry of Technical and Operational Wireless
E9-1-1**

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President-Elect, Association of Public-Safety Communications Officials-
International, Inc. (APCO)
Before the
Federal Communications Commission
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Thank you, Mr. Hatfield and members of the Commission staff for inviting me to appear before you today.

My name is Thera Bradshaw. I am President-Elect of the Association of Public-Safety Communications Officials-International, Inc. ("APCO"), and appear before you today on APCO's behalf. I have 29 years of executive leadership experience in policy, administration, and operations of 9-1-1 communications dispatch centers. I began my career following college as a 9-1-1 dispatcher. Appointed by Mayor Willie Brown, I am Executive Director of the 9-1-1 Emergency Communications Department for the City and County of San Francisco; one the 6,000 9-1-1 communications dispatch centers serving communities in America.

In 1995, I was the National Emergency Number Association President. As President of NENA, my name is one of the four signatories on the original consensus document with APCO, NASNA, and Industry that led to the proceeding in FCC docket 94-102. That was seven years ago. Today we still have not achieved enhanced 9-1-1 with critical information on wireless calls for help.

Three associations, APCO, NENA, and NASNA are before you today, together with our collective experience and as colleagues in partnership to provide not just five minutes each, but 15 minutes of a more comprehensive testimony describing major barriers to E9-1-1 implementation. While there are many barriers to implementation, we elected to focus on three topics each. The three areas I will address in these opening remarks are: Independent Research & Testing of Products, PSAP Readiness, and Waiver filings.

However, as an initial matter, I want to encourage you, Mr. Hatfield, to ask tough questions of switch and handset manufactures, location technology providers, and carriers. You and the Commission must ascertain the real sources of delay. For example; when did carriers place orders for equipment deliveries that are claimed to be now running behind schedule? Are carriers exercising reasonable pressure on suppliers to deliver, or is there an acceptance of lengthy delivery schedules as a convenient excuse to postpone E9-1-1 compliance? The answers to tough questions like these will enlighten all of us why the goal of full wireless E9-1-1 is not yet achieved.

Independent Research & Testing of Products

Mr. Hatfield, a critical area where you and the panel can make a major impact is in the field of independent research and testing of products. While public safety does not embrace any particular technology or vendor, we do expect wireless carriers to utilize proven products where they exist, rather than ignore available solutions in favor of untested and unproven technology, as sought in some of the waiver requests.

We encourage research on new technology, but not at the expense of further delays when there are proven life-saving solutions. Public safety is continually approached by vendors stating their products meet or exceed FCC requirements. At the same time carriers and vendors point out shortcomings in the test methods used by the other. We are not in the position to verify or dispute the claims of either. You can bring in the investigative powers to help sort through these claims.

This is a critical need and will assist in determining ways to move forward utilizing today's proven technology, not waiting for tomorrow's solutions while lives are at stake and the world is at war on terrorism.

Again public safety is not advocating any specific company or technology, but we are insisting that workable solutions be implemented in an expedient manner.

Once installations are in place the FCC will need a mechanism to verify that the accuracy requirements are being met. This too will require independent testing and verification.

Public Safety Answering Point Readiness

From the beginning, we in public safety recognized the absolute necessity that we do our part to ensure the timely implementation of wireless E9-1-1. There are over 6,000 PSAPs, and we are the first to acknowledge that not all are technically ready to accept information on wireless 9-1-1 calls. Many are still learning what is required of them and are making preparations, including necessary system upgrades. To help address this issue, APCO established Project LOCATE, which has been conducting educational

efforts, including the establishment of “model PSAPs”. The model PSAPs are in each state in the United States and the District of Columbia.

I do want to emphasize there are a significant number of 9-1-1 centers that are ready to implement E9-1-1 and have made formal requests for Phase I and/or Phase II. It is in these locations where the FCC’s assistance could be beneficial. Questions and disputes still remain over such issues as the actual costs involved in upgrades, and how some of these costs are to be shared. There are repeated instances of confusion over who is responsible for expenses such as the E-2 interface and other network circuits, and what type of mapping system is required before wireless carriers consider PSAPs “ready”.

The Richardson ruling helped to specify what is expected of a PSAP. However it has also been used as a method of delay. PSAPs are required to produce certain proof in the event a carrier challenges the validity of a request, which is certainly reasonable. But it now appears to be standard practice by the carriers to challenge every request even if there are no reasons to doubt validity. This has the effect of delaying the implementation process.

We would like to see implementation approached with the assumption that a timely response will be generated, rather than the current practice where wireless carriers will proceed only when it is proven that they must. It is evident that each PSAP is different and has unique requirements. PSAPs acknowledge this and the vast majority are submitting requests in good faith, with a willingness to rectify discrepancies as identified.

Waivers

Another very complex factor that has obviously had a negative impact on enhanced 9-1-1 compliance has been the numerous waivers and time extensions sought by major carriers. This is not the forum to discuss the merits or demerits of specific carriers' waiver requests, past or present. However as a general point, the mere existence of such requests has been a troubling source of delay. The never-ending stream of requests, public notices, comments, public advocacy and extended Commission consideration diverts scarce resources that would be better focused on making wireless enhanced 9-1-1 a reality and not just a source of inside the beltway debate.

Conclusion

The challenges before us are great. And September 11 is still fresh in our mind. I am confident that a united effort with all stakeholders including local exchange carriers, wireless industry, equipment manufacturers, technology providers, PSAP's, and the FCC will ultimately allow America to have state-of-the-art 9-1-1 emergency communications capabilities with critical information available on all 9-1-1 calls for help. The "first" first responder is the 9-1-1 communications center. Quality information is critical for timely effective action in the delivery of public safety resources to those in need of help. It is imperative given the situation in the world today that we unify in commitment towards resolution of issues and that all parties do everything within their power to improve 9-1-1 in the wireless world of today.